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11 Attorney for Defendant  
12 JESUS PANIAGUA

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 vs.  
14 JESUS PANIAGUA,  
15 Defendant.

Case No. 1:19-CR-00277-DAD-BAM

**STIPULATION TO EXCLUDE TIME;  
ORDER**

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The parties, through their respective counsel, Anthony Yim, Assistant United States Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender, counsel for the defendant, JESUS PANIAGUA, hereby stipulate as of January 14, 2020 defense counsel has received initial discovery and the parties hereby stipulation to exclude speedy trial time.

The parties request this exclusion with the intention of conserving time and resources for both the parties and the Court. The parties agree that the delay resulting from the continuance shall be excluded in the interests of justice, including but not limited to, the need for the period of time set forth herein for effective defense preparation, defense investigation, and plea negotiation purposes pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

Respectfully submitted,

BENJAMIN J. WAGNER  
United States Attorney

Dated: January 14, 2020

/s/ Anthony Yim  
Anthony Yim  
Assistant United State Attorney  
Attorney for the Government

HEATHER E. WILLIAMS  
Federal Defender

Date: January 14, 2020

/s/ Benjamin A. Gerson  
BENJAMIN A. GERSON  
Assistant Federal Defender  
Attorney for Defendant  
JESUS PANIAGUA

## **ORDER**

Pursuant to the parties' stipulation, time is excluded from January 14, 2020 to the next status conference on January 27, 2020.

IT IS SO ORDERED.

Dated: **January 14, 2020**

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE